

NAGEL RICE, LLP

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Attorney for Lungisile Ntsebeza, et al. on behalf of those similarly situated

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

MOTORS LIQUIDATION COMPANY, *et al.*,
f/k/a GENERAL MOTORS CORP., *et al.*,

Debtors.

)
)
) Chapter 11
)
) Case No. 09-50026 (REG)
)
) Jointly Administered
)

**NOTICE OF APPEARANCE AND REQUEST
FOR SERVICE OF NOTICES AND DOCUMENTS**

TO THE HONORABLE ROBERT E. GERBER,
UNITED STATES BANKRUPTCY JUDGE:

PLEASE TAKE NOTICE that the undersigned appears as counsel to Lungisile Ntsebeza, Tozamile Botha, Mpumelelo Cilibe, William Daniel Peters, James Michael Tamboer, Samuel Soyisile Mali, Msitheli Wellington Nonyukela, Mantoa Dorothy Molefi, Nothini Betty Dyonashe, Nonkululeko Sylvia Ngcaka, Mirriam Mzamo, Mncekeleli Henyn Simangentloki and Hans Langford Phiri ("*Ntsebeza*"), parties-in-interest herein and, pursuant to 11 U.S.C. § 1109(b) and Federal Rules of Bankruptcy Procedure 2002 and 9010(b), hereby requests that all notices given or requires to be given in this case be given and served up:

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PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only the notices and papers referred to in the Federal Rules of Bankruptcy Procedure specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether written or oral, formal or informal, and whether transmitted or conveyed by mail, hand delivery, facsimile transmission, e-mail, telephone, telegraph, telex or otherwise, which affects the above-captioned Debtors or the property of or in the possession, custody or control of the Debtors or which is otherwise filed or given with regard to the above-referenced case in any adversary proceeding or contested matter therein.

PLEASE TAKE FURTHER NOTICE that neither this notice nor any later appearance, pleading, claim or suit shall waive any right of the *Ntsebeza* parties-in-interest: (1) to have final orders in non-core matters entered only after *de novo* review by a District Judge, (2) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (3) to have the District Court withdraw the referenced in any matter subject to mandatory or discretionary withdrawal, or (4) to contend that jurisdiction or venue in this Court is improper or inappropriate.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Request for Service of Notices and Documents is without prejudice to *Ntsebeza* parties-in-interest rights, remedies, claims, actions, defenses, setoffs, or recoupments, in law or in equity, against the

Debtors and any other entities either in this case or in any other action, all of which rights, remedies, claims, actions, defenses, setoffs and recoupments are expressly reserved.

Dated: Roseland, New Jersey
June 22, 2010

NAGEL RICE, LLP

By: s/Diane E. Sammons
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